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*Attorneys for Defendant Bank of America, N.A.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LISA GORDON

Plaintiff,

vs.

BANK OF AMERICA, N.A.

Defendant.

Case No.: 2:25-cv-00560-JCM-DJA

**JOINT MOTION FOR EXTENSION OF  
TIME TO RESPOND TO PLAINTIFF'S  
COMPLAINT**

**[FIRST REQUEST]**

Defendant Bank of America, N.A. ("BANA"), and Plaintiff Lisa Gordon ("Plaintiff") by and through their respective undersigned counsel of record, hereby moves the Court, pursuant to Rule 6 of the Federal Rules of Civil Procedure, for an extension of time for BANA to answer or otherwise respond to the Complaint filed by Plaintiff. In support of this motion, BANA states as follows:

1. Plaintiff filed her Complaint on March 27, 2025 (Doc. 1).
2. BANA was served with a copy of the Summons and the Complaint on April 1, 2025. (Doc. 4).
3. BANA's answer or response is therefore due on or before April 22, 2025. The time originally prescribed for the filing and service of BANA's response has therefore not expired.
4. BANA is currently investigating the allegations in Plaintiff's Complaint and requests additional time within which to conduct the investigation and formulate a response to

1 Plaintiff's Complaint. In addition, the parties are engaged in preliminary settlement negotiations  
 2 and accordingly wish to extend BANA's deadline in the interest of judicial efficiency so that they  
 3 may further discuss settlement.

4 5. BANA therefore requests a twenty-one (21) day extension of time to answer or  
 5 respond to Plaintiff's Complaint, through May 13, 2025.

6 6. This is the first extension requested by BANA.

7 7. Counsel for BANA has conferred with Plaintiff's counsel, who consents to this  
 8 Motion and the proposed answer or response date of May 13, 2025.

9 8. This joint motion is made in good faith and not for the purpose of delay, and no  
 10 party will be prejudiced by a brief extension of time.

11 WHEREFORE, Defendant Bank of America, N.A. respectfully requests that the Court enter  
 12 an Order allowing BANA an extension of time up to and including May 13, 2025, to answer or  
 13 otherwise respond to Plaintiffs' Complaint.

14 Dated: April 17, 2025

15 LAW OFFICE OF KEVIN L. HERNANDEZ

16 SNELL & WILMER L.L.P.

17 By: /s/ Kevin L. Hernandez  
 18 Kevin L. Hernandez, Esq. (NV Bar No. 12594)  
 19 8920 W. Tropicana Avenue, Suite 101  
 20 Las Vegas, NV 89147

By: /s/ John S. Delikanakis  
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21 *Attorneys for Plaintiff*

*Attorneys for Defendant Bank of America,  
 N.A.*

## 22 ORDER

23 IT IS SO ORDERED.

24   
 25  
 26 UNITED STATES MAGISTRATE JUDGE

27 Dated: 4/18/2025

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** by method indicated below:

- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by \_\_\_\_\_, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

and addressed to the following:

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*Attorneys for Plaintiff*

DATED April 17, 2025

/s/ Michelle Shypkoski  
 An employee of SNELL & WILMER L.L.P.